

Guide for Review of Overall Management Systems			
Name of Program Participant:			
Staff Consulted:			
Name of Project:			
Name(s) of Reviewer(s)		Date	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding.**"

Instructions: Use this Exhibit to monitor the program participant's overall management of the CDBG program.

Questions

1.

a. What is the program participant's system(s) or procedure(s) for ensuring that CDBG funds are used in accordance with program requirements? [24 CFR 570.501(b) and 24 CFR Subpart K]
Describe Basis for Conclusion:

Exhibit 3-17
CDBG Entitlement Program

b. Does the program participant maintain written procedures describing its management of the CDBG program?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No

Describe Basis for Conclusion:

c. How are responsibilities for implementing and managing the CDBG program assigned and delegated?

Describe Basis for Conclusion:

2.

a. Who is in charge of the day-to-day administration of the program? (Include name and title and organizational chart, if available.)

Describe Basis for Conclusion:

b. How long has the administrator been in this position?

Describe Basis for Conclusion:

c. What information is routinely passed to this person?

Describe Basis for Conclusion:

Exhibit 3-17
CDBG Entitlement Program

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d. Does this person have appropriate authority to effect change or force actions to occur?	<input type="checkbox"/>	<input type="checkbox"/>
Yes No		
Describe Basis for Conclusion: 		

3.

a. Has a system been developed to track the progress of each CDBG-funded project or activity?	<input type="checkbox"/>	<input type="checkbox"/>
Yes No		
Describe Basis for Conclusion: 		

Exhibit 3-17
CDBG Entitlement Program

b. If developed, does the tracking system include a timetable with scheduled completion dates?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

4.

Does the program participant have an information system to collect the following data for the Consolidated Annual Performance and Evaluation Report (CAPER), with regard to the use and investment of CDBG resources:			
a. Physical location and geographic distribution?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
b. Low- and moderate-income beneficiaries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
c. Racial/ethnic data (beneficiaries and displacees)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
d. Fair housing actions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
e. Housing characteristics ? [24 CFR 91.520]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

Exhibit 3-17
CDBG Entitlement Program

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5.

a. For each of the questions in number 4.a.-e. above, is the program participant's in-house information consistent with the information the program participant entered into IDIS for the time period reviewed? [24 CFR 91.525(a)(3)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion: 		

b. If discrepancies were noted, do the inconsistencies appear to be isolated or systemic? [24 CFR 570.506, 24 CFR 570.507, and 24 CFR 91.525(a)(3)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: 			

6.

Does the program participant maintain sufficient records to demonstrate compliance with CDBG requirements? [24 CFR 570.506]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion: 		

7.

Does the program participant submit its Consolidated Annual Performance and Evaluation Report in a timely and accurate manner? [24 CFR 91.520(f)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion: 		